

IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA (HARRISBURG)

IN RE:) BANKRUPTCY CASE
)
Edward Franklin Dabney,) NO.: 1:20-bk-00555-HWV
Angelea Michelle Jones,)
) CHAPTER 13
Debtors.)
) Chief Judge Henry W. Van Eck
)
)

NOTICE OF FORBEARANCE EXTENSION DUE TO THE COVID-19
PANDEMIC

Now comes Freedom Mortgage Corporation (“Creditor”), by and through undersigned agent, and hereby submits Notice of Extension of Forbearance to the Court based on the Debtors’ request for mortgage payment forbearance due to hardship caused by the COVID-19 pandemic.

The Debtors contacted Creditor requesting a forbearance and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting June 1, 2021 through November 30, 2021. Debtors have requested an extension of the forbearance and Creditor has granted the Debtors’ forbearance extension request for an additional 150 days to April 30, 2022. To the extent the forbearance period is not extended for an additional period of time as provided under the CARES and the Consolidated Appropriations Act, Debtors will resume mortgage payments beginning May 1, 2022. Near the end of the forbearance period, debtor, through counsel, will need to engage with Creditor on a solution for payments suspended during the forbearance.

Creditor does not waive any rights to collect the payments that come due during the forbearance period. Furthermore, Creditor does not waive its rights under other applicable non-

bankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect on any post-petition escrow shortage.

Creditor does not waive its rights to seek relief from the automatic stay for other reasons other than non-payment of the Mortgage, including, but not limited to, a lapse in insurance coverage or payment of property taxes.

Respectfully submitted,
/s/ Michelle Hart Ippoliti
Michelle Hart Ippoliti, Agent for Creditor
McCalla Raymer Leibert Pierce, LLC
1544 Old Alabama Road
Roswell, GA 30076
(678) 281-6537
michelle.ippoliti@mccalla.com

CERTIFICATE OF SERVICE

I, Michelle Hart Ippoliti, of McCalla Raymer Leibert Pierce, LLC, 1544 Old Alabama Road, Roswell, GA 30076, certify:

That I am, and at all times hereinafter mentioned, was more than 18 years of age;

That on the date below, I served a copy of the within Notice of Forbearance filed in this bankruptcy matter on the following parties at the addresses shown, by regular United States Mail, with proper postage affixed, unless another manner of service is expressly indicated:

Edward Franklin Dabney
1590 Pleader Lane
York, PA 17402

Angelea Michelle Jones
1590 Pleader Lane
York, PA 17402

(served via ECF Notification)
Dawn Marie Cutaia
Pugh and Cutaia, PLLC
115 E. Philadelphia Street
York, PA 17401

(served via ECF Notification)
Asst. U.S. Trustee
United States Trustee
228 Walnut Street, Suite 1190
Harrisburg, PA 17101

(served via ECF Notification)
Jack N Zaharopoulos (Trustee) Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on: 12/28/2021 By: /s/ Michelle Hart Ippoliti
(date) Agent for Creditor